

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION

GRADY NIXON III 182482

PLAINTIFF

20

D.A. #43

v.

COMMISSIONER RICHARD HILLER
et al.

DEFENDANTS

3:07-CV-517-WKW

U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

PLAINTIFF ANSWER AND/OR AMENDED COMPLAINT

AND

MOTION FOR ORDER TO RELEASE MEDICAL FILES

COMES NOW THE PLAINTIFF IN THE ABOVE STYLED CAUSE, AND RESPECTFULLY REQUESTS AND MOVE THIS HONORABLE COURT FOR AN ORDER COMPELLING THE ALABAMA DEPT. OF CORRECTIONS TO FORWARD TO SAID PLAINTIFF ANY AND ALL MEDICAL RECORDS FROM APRIL 2007 TO PRESENT.

THAT IN AN EFFORT TO COMPLY WITH THE COURTS ORDER TO THE SPECIFIC DIRECTIVES THESE RECORDS ARE NEEDED TO IDENTIFY SPECIFIC FACTUAL ALLEGATIONS THAT ARE MATERIAL TO EACH COUNT AGAINST DEFENDANTS.

HOWEVER IN AN EFFORT TO CORRECT DEFICIENCIES PLAINTIFF IS PREPARED TO NAME NURSE HARRELL, FORMERLY ASSIGNED TO ALEXANDER CITY WORK-RELEASE, DR'S. T TRAVES, VO V. LOCKHART PA/ OTHER DOCTORS NAMES NOT READABLE ON COMMUNICATIONS FORMS WHICH IS WHY MEDICAL RECORDS ARE NEEDED AND/OR THE NAMES OF PRACTICING PHYSICIANS WITH MEDICAL CONTRACTOR... AND INCLUDE B. ADAMS CRN #1 ALSO PAGE 1 of 2

PETITIONER IS FAITHFULLY ATTEMPTING TO
SATISFY THE COURTS AND FULLY COMPLY WITH
COURT ORDERED AMENDMENT TO ORIGINAL COMPLAINT,
HOWEVER DUE TO LIMITED ACCESS RECORDS AND
PERSONNEL INVOLVED IN PLAINTIFFS INJURIES, IT IS
NECESSARY FOR PLAINTIFF TO REQUIRE ADDITIONAL
TIME AND FILES.

RESPECTFULLY SUBMITTED
Grody Nixon III
PLAINTIFF ATTEST
FOR WITNESS

DECLARATION:

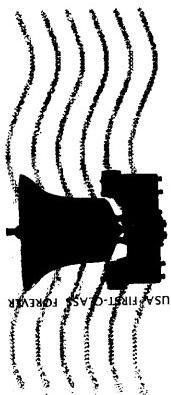
UNDER PENALTY PLAINTIFF ATTEST THAT
THE foregoing IS TRUE:

Grody Nixon III
PLAINTIFF ATTEST
FOR WITNESS

FROM Mr. Brady Mean Jr.
#182482
P.O. DENVER 160
ALEXANDER CITY, AL. 35011

MONTGOMERY AL 351

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